



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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January 30, 2004

Robert H. Thomas 61-50 DW
International Paper
P.O. Box 539
Terre Haute, IN 47808

Re: Response to Review Request No. 16419:
 Section 112(j) Applicability Determination
 Plant ID: 167-00022

Dear Mr. Thomas:

International Paper, located at 2401 Prairieton Avenue in Terre Haute, Indiana, submitted a request for an applicability determination regarding the requirements of Section 112(j) of the Clean Air Act (CAA) on May 15, 2002. The letter was submitted in accordance with 40 CFR 63.52(d)(1) and requested that the Indiana Department of Environmental Management, Office of Air Quality (IDEM, OAQ) determine if International Paper is subject to the requirements of Section 112(j) (40 CFR 63.50 through 63.56) for the following source categories:

- Miscellaneous Metal Parts & Products Surface Coating; and
- Paint Stripping Operations.

Pursuant to 40 CFR 63.50, the requirements of Section 112(j) will apply only if your entire source is a major source of hazardous air pollutants (HAPs) and one or more of your processes or emissions units belong in a category or subcategory for which the United States Environmental Protection Agency (U.S. EPA) has failed to promulgate an emission standard on or before the Section 112(j) deadline. IDEM, OAQ has determined that your source is not subject to Section 112(j) for the following source categories:

- Miscellaneous Metal Parts & Products Surface Coating; and
- Paint Stripping Operations.

Explanations of these determinations are provided below.

MAJOR SOURCE DETERMINATION

The information submitted in the Part 1 MACT Application indicates that International Paper is a major source of HAPs. In addition, the potential to emit calculations for the proposed Title V operating permit for International Paper, T167-7358-00022, indicate that the source is a major source of HAPs. Since International Paper is a major source of HAPs, IDEM, OAQ evaluated the source categories for which International Paper requested an applicability determination.

SOURCE CATEGORY DETERMINATION

1. **Miscellaneous Metal Parts & Products Surface Coating NESHAP**

Since the final MACT standard for Miscellaneous Metal Parts & Products Surface Coating was promulgated on January 2, 2004, International Paper is no longer subject to Section 112(j) for that source category. International Paper should check the applicability of the MACT standard. If the promulgated MACT is applicable, International Paper shall comply with the promulgated MACT standard in accordance with the schedule provided in the MACT standard. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), if International Paper is subject to the MACT, International Paper shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives an initial notification, any of the following will occur:

- (A) Since three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or
- (B) The owner or operator of the affected source may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

If the promulgated MACT is not applicable, no further action regarding the MACT will be necessary.

2. **Paint Stripping Operations NESHAP**

IDEM, OAQ used the following information to determine if the surface preparation activities, including scraping, abrasive blasting, and chemical stripping, at International Paper belong to the affected source category, Paint Stripping Operations:

- The Part 1 Maximum Achievable Control Technology (MACT) Application;
- The potential to emit calculations for the draft Title V operating permit for International Paper;
- U.S. EPA's *"Draft Presumptive Maximum Achievable Control Technology for the Paint Stripping Operations Source Category"* dated January 1999; and
- Background information available at the U.S. EPA Air Toxics Website at http://www.epa.gov/ttn/atw/paintst/pnt_stpg.html.

There is no proposed or final MACT Standard for the Paint Stripping Operations source category. The *"Draft Presumptive Maximum Achievable Control Technology for the Paint Stripping Operations Source Category"* for the Paint Stripping Operations NESHAP indicates *that* the source category affected by this MACT is expected to be limited to operations such as wood furniture refinishing and large vehicle stripping (e.g., train cars, trucks, heavy equipment) that are not covered in source-category-specific MACT standards. Based on this information, it is not likely that the surface preparation activities at International Paper will be regulated by the final rule for the Paint Stripping Operations source category.

Pursuant to 40 CFR 63.52(e)(2)(i), based on the information available at this time, IDEM, OAQ has determined that the surface preparation activities at International Paper do not belong to the affected source category, Paint Stripping Operations. International Paper will not be required to submit a Part 2 MACT Application in accordance with 40 CFR 63.53(b) for this affected source category. If International Paper is subject to Section 112(j) for any other source categories, International Paper shall submit a Part 2 MACT Application for those source categories.

If U.S. EPA promulgates a final MACT standard prior to IDEM, OAQ issuing a permit containing the Section 112(j) determination requirements, a source is no longer subject to Section 112(j) for that source category, including the requirement to submit a Section 112(j) Part 2 MACT Application. A source is still subject to Section 112(j) for any other source categories that do not have promulgated MACT standards.

This determination is based on the information provided by International Paper, IDEM, OAQ records, and the information currently available from the U.S. EPA. Note that if additional equipment or capacity is added or operational practices are changed (e.g., switching solvents from a solvent that contains no HAPs to a solvent containing HAPs), the Section 112(j) requirements may be triggered in accordance with 40 CFR 63.52(b). If the events described in 40 CFR 63.52(b) occur at the source, International Paper shall submit a Part 1 MACT Application in accordance with the requirements and schedule contained in 40 CFR 63.52(b).

Questions should be directed to Kimberly Cottrell, IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Kim Cottrell at extension 3-0870, or dial (317) 233-0870.

Sincerely,

Original Signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

KLC

CC: File – Vigo County
Vigo County Health Department
Air Compliance – Jim Thorpe
Vigo Air Pollution Control Agency – Rob Harmon
Administration Section
U.S. EPA Region V – Genevieve Damico